U.S. Consumer Product Safety Commission



1999 ANNUAL PERFORMANCE PLAN

Saving Lives and Keeping Families Safe

February 1998

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OVERVIEW OF CPSC'S STRATEGIC PLAN

CPSC's Mission: To reduce unreasonable risks of injury and death from consumer products, and to assist consumers in evaluating the comparative safety of consumer products.

CPSC's Vision: CPSC envisions: a marketplace where consumer products are as free as reasonably possible from defects and hidden hazards; product designs that minimize the potential for failure and human error; routine use of early warning and protection systems; state of-the-art information technology that rapidly identifies potentially hazardous products; and world safety standards that are modeled on the often higher standards of the United States.

STRATEGIC GOALS

Reduce Product-Related Injuries and Deaths

- ! Reduce the product-related head injury rate to children by 10 percent.
- ! Prevent any increase in the death rate to children under 5 years from unintentional poisoning by drugs or hazardous household substances.
- ! Reduce the fire-related death rate by 10 percent.
- ! Reduce the carbon monoxide poisoning death rate by 20 percent.
- ! Reduce the electrocution death rate by 20 percent.

Provide Quality Services to the American Public

- ! Increase contacts by the public to CPSC's web site by 500 percent.
- ! Increase the reach of the Consumer Product Safety Review by 200 percent.
- ! Maintain the capability to respond to 250,000 Hotline calls per year.

Maintain High Levels of Customer Satisfaction with CPSC services

- ! Attain 80 percent success with the timeliness and usefulness of the Fast Track Product Recall and Small Business Ombudsman programs.
- ! Maintain consumer satisfaction with the Hotline and Clearinghouse and the states with CPSC's State Partnership Program at 90 percent or better.



CPSC's Annual Performance Plan For 1999

Introduction

The U.S. Consumer Product Safety Commission (CPSC), an independent health and safety regulatory agency, has the primary mission of protecting the American public from risks of injury and death from 15,000 categories of consumer products. Each year, there are an average of over 21,000 deaths and 29 million injuries associated with consumer products under the Commission's jurisdiction. These injuries and deaths cost the American public over \$200 billion annually. Children under 5 years are most likely to require emergency room treatment and the elderly are most likely to die as a result of product-related injuries.

Since the agency was established in the early 1970s, product-related death and injury rates have decreased substantially. Each year, these reductions save the American public billions of dollars. In fact, results of Commission activities from three safety standards alone are estimated to total between \$1.6 and \$1.8 billion annually, more than CPSC's total cumulative budget since its inception in 1973. These safety standards annually prevent about 150 to 200 infant deaths from poorly designed cribs; 24,000 lawn mower injuries, primarily from severed fingers and toes; and a projected 100 deaths from children playing with cigarette lighters.

Much more needs to be done, however, to protect American families from product-related deaths and injuries. CPSC is the only Federal agency that identifies and acts on a wide range of product hazards. In establishing the CPSC, Congress noted that consumers are often unable to anticipate risks from consumer products or to safeguard themselves, not only because of the complexities of some consumer products in the marketplace, but also because of the diverse nature and abilities of those who use the products. This is as true today as it was then. Furthermore, many consumer products are sufficiently complex and the hazards of even uncomplicated products may be sufficiently hidden, that government action to inform or otherwise protect the public is a wise use of taxpayer dollars.

Strategic Plan

The Commission is responsible for administering five Federal statutes: the Consumer Product Safety Act, the Flammable Fabrics Act, the Poison Prevention Packaging Act, the Federal Hazardous Substances Act and the Refrigerator Safety Act. In the agency's first strategic plan under the Government Performance and Results Act (the Results Act), CPSC set goals to: reduce the estimated 800,000 annual product-related head injuries to children

under 15 years old; prevent any increase in the low number of unintentional poisoning deaths to children under 5 years old from hazardous household substances and drugs; reduce deaths from residential fires that claim up to 3,700 lives each year; reduce carbon monoxide (CO) poisoning deaths, many of which involve gas-fueled heating appliances; and reduce deaths from electrocutions caused by such products as house wiring, power tools, and small appliances.

Along with its primary mission, CPSC is also charged with alerting the public to important safety information to assist it in evaluating the comparative safety of consumer products. To this end, strategic goals were set to increase the public's access to safety alerts, recalls, press releases and publications through increased contacts with CPSC's Web Site and the *Consumer Product Safety Review* publication, while maintaining the agency's capability to respond to 250,000 or more Hotline calls annually. Finally, strategic goals were set to maintain the already high levels of customer satisfaction with CPSC's Hotline, Clearinghouse, and State Partners program, as well as setting a goal for the timeliness and usefulness of services to industry. These strategic goals have timelines ranging from 3 years for consumer information (service quality) and customer satisfaction goals, to 10 years for injury and death reduction goals.

The strategic goals were set at the agency level. CPSC will measure its effectiveness in accomplishing the strategic goals by combining results of activities across three core budget programs. For example, to measure agency effectiveness in reaching its injury reduction goals, the total number of lives saved or injuries prevented will be assessed based on a combination of hazard projects in the Hazard Assessment and Reduction Program, corrective actions in the Compliance Program, and information and education activities in the Consumer Information Program. Activities from the two remaining programs, Hazard Identification and Analysis and Agency Management, provide support for the Hazard Assessment and Reduction, Compliance and Consumer Information programs.

Annual Goals

Annual goals have several characteristics: they should be measurable, expressed in an objective and quantifiable way, and linked to the longer-term strategic goals by defining what progress will be achieved towards accomplishing these strategic goals during the fiscal year.

In 1999, the Commission will engage in a number of activities that will achieve progress towards reaching its strategic goals. For results-oriented strategic goals, annual performance goals were developed for activities that are linked to these strategic goals and that staff believes will contribute to a reduction in injuries or deaths. Staff categorized CPSC's 1999 projects and activities (e.g., voluntary standards, recalls) and set annual goals for the activities in each category. For example, to make progress towards reducing fire-related deaths, an annual goal is to prepare recommendations to develop or strengthen six fire-related safety

standards. For service quality and customer satisfaction strategic goals, annual performance

goals were set for those activities that will directly improve or maintain services to the American public.

Estimated versus Targeted Goals. The Commission engages in different types of activities that require two different types of annual goals. Activities can be categorized as those that react to critical safety problems in the marketplace, such as recalls, corrective actions, and news releases, and *planned* activities, such as developing safety standards.

For activities that address unforseen safety issues, annual goals are more appropriately characterized as estimates. A numerical goal for these types of activities was set based on four years of historical data. However, the actual number of recalls, news releases, and unpredictable events in 1999 may vary depending on the safety-related circumstances arising during that year.

For longer-term projects, an annual goal is a *target* staff set for completing a certain number of activities; improving services; and maintaining customer satisfaction with CPSC services. For example, in 1999 a fire-related annual goal is to issue six alerts or warnings about fire hazards to the public.

Annualized Goals. An annualized goal sets a target for the percent of the strategic goal that will be achieved in a given year. For example, if a strategic goal is set to reduce the fire-related death rate by 10 percent in 10 years, an annualized goal could be to reduce the firerelated death rate by 1 percent in 1999.

For regulatory agencies¹, annualized goals are usually difficult to establish because the impact of their activities may take years to be seen. Product-related injury and death reductions depend, in part, on how long consumers keep specific products, and many products the Commission targets for action have a fairly long product-life. The effect on injury or death reductions, in these cases, would not be measurable until consumers replaced a substantial proportion of older products with safer products. For example, arc fault detection devices are a promising new technology that may prevent fire deaths. Implementation of this technology may take many years to be reflected in the reduction of fire-related deaths because it will be used initially only in new home construction.

With the exception of the annual goal for the number of contacts to CPSC's web site, the agency has not set annualized goals for 1999. However, it will track product-related injuries and deaths each year and examine any reductions in the light of Commission actions.

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¹GAO (June 1997). Managing for Results: Regulatory Agencies Identified Significant Barriers to Focusing on Results. Report to Committee on Governmental Affairs, U.S. Senate and Committee on Government Reform and Oversight, U.S. House of Representatives.

Need for Flexibility. To carry out its mission of reducing injuries and deaths, it is vitally important that CPSC preserve its flexibility to respond to unforseen critical safety situations. Responding to these emerging hazards may occasionally force the Commission to rearrange priorities and adjust annual goals in the future. Because CPSC's budget and staff were cut significantly during the 1980s, and have remained at that low level in the 1990s, the agency's resources are thinner than they should be to deal with the wide range of issues the agency faces. When the agency needs to respond quickly to address unforeseen risks and hazards, it often must shift staff and resources. For example, in 1994, CPSC quickly obtained recalls of more than 250,000 dangerously flammable skirts that did not meet CPSC flammability rules and in fact burned faster than newspaper. This hazard resulted in a four-week delay of other work because of extensive testing and requirements for country-of-origin notice, firm negotiations, and the notification of retailers necessary for the recall.

Crosscutting Goals

CPSC has a unique mission among federal agencies. It is the only federal agency that identifies and addresses a wide range of product hazards. CPSC regulates only if necessary when voluntary standards and the marketplace prove to be ineffective. The Commission also uses other tools to reduce injuries and deaths that include working with other federal agencies to more efficiently address health and safety issues and to avoid duplication of effort.

CPSC staff identified three federal agencies with similar strategic goals: Health and Human Services (HHS), the Department of Transportation (DOT), and the Federal Emergency Management Administration (FEMA) (see Table A). CPSC's strategic goal of reducing head injuries to children for a wide range of products is similar to HHS' goal to reduce bicycle-related head injuries to children and DOT's strategic goal to reduce bicycle-related fatalities. CPSC's strategic goal to reduce residential fire-related deaths is the same as that of HHS' and similar to FEMA's strategic goal to reduce all fire-related deaths. The targets for these strategic goals are consistent among the four agencies. CPSC's other strategic goals are not shared by any other federal agencies.

Table A provides an overview of the 1999 annual goals for each agency that make progress towards the crosscutting strategic goals. These annual goals are mutually reinforcing among the four agencies. CPSC's contribution includes developing safety standards; pursuing recalls and corrective actions of defective products, as well as products that violate mandatory safety standards; conducting technical feasibility studies; and issuing press releases, safety alerts, and warnings to increase public awareness of product safety hazards. FEMA, through the U.S. Fire Administration (USFA), collects and provides essential data on residential fires, stimulates new technology, provides training and education opportunities for the Nation's fire protection community and conducts public education campaigns relating to fire. DOT, through the National Highway Traffic Safety Administration (NHTSA), "provides national leadership and technical assistance to build advocacy for pedestrian and bicycle safety at the community

Table A
1999 Annual Performance Goals for CPSC and Other Federal Agencies with Crosscutting Strategic Goals¹

CPSC: Reduce the Death Rate from Residential Fires

- ! Prepare for Commission consideration 2 candidates for final rulemaking or other alternatives.
- ! Send to Voluntary Standards Committees recommendations to strengthen or develop 6 voluntary standards.
- ! Pursue for recall or other corrective action an estimated 50 products with fire-related hazards.
- ! Identify and correct an estimated 350 products that fail to meet mandatory fire safety standards.
- ! Issue an estimated 35 press releases for recalled products with a fire hazard.
- ! Complete 2 technical feasibility studies.
- ! Complete 5 hazard analysis and data collection activities.
- ! Issue 6 public alerts or warnings on products with fire hazards (e.g., heating equipment, cigarette lighters).

CPSC: Reduce Head Injuries to Children

- ! Send to Voluntary Standards Committees recommendations to strengthen or develop 6 voluntary standards.
- ! Pursue for recall or other corrective action an estimated 15 products that present a substantial risk of head injury.
- ! Identify and correct an estimated 10 products that fail to meet mandatory safety standards and are likely to be involved in head injury.
- ! Issue an estimated 15 press releases to warn the public about recalled products with a substantial risk of head injury.
- ! Issue 4 public alerts or warnings for products with head injury hazards (bicycles, ATVs, shopping carts, winter sports).
- ! Complete 2 testing and data collection activities.

FEMA: Reduce Loss of Life and Property from Fire-Related Hazards

- ! Identify the national fire problem and analyze, publish and disseminate related data and information.
- ! Educate the public on fire prevention, targeting groups most vulnerable to fire.
- ! Conduct a continuing program of development, testing, and evaluation of equipment, practices, and technology for use by the Nation's fire and emergency services.
- ! Provide training and education opportunities for the Nation's fire protection community.

HHS (CDC): Reduce the Death Rate from Residential Fires

! Increase the percent of residential dwellings that have at least one functional smoke detector.

DOT (NHSTA): Reduce the Number of Fatalities to Bicyclists

Progress in reducing bicycle fatalities; progress towards increasing use of bicycle helmets by:

- ! Developing and implementing programs to build advocacy for bicycle safety at the community level.
- ! Increasing injury control efforts through partnerships and outreach.
- ! Developing and obtaining needed data on bicycle helmet usage, bicycle injuries and costs of injuries.
- ! Developing and disseminating community-based case studies on successful programs reducing pedestrian and/or bicycle injuries.
- ! Providing technical expertise on bicycle safety to organizations with local affiliates.
- ! Increasing bicycle programs at the local level.

HHS (CDC): Reduce the number of emergency room visits of children with bicycle-related head injuries.

! Increase the use of bicycle helmets by children.

¹FEMA, DOT, and HHS annual goals from draft annual performance plans.

level." NHTSA's strategies include partnerships, technical assistance, training for law enforcement and transportation engineers, educational events, and public information. HHS, through the Centers for Disease Control (CDC), supports state and local health departments, academic institutions, community-based organizations for applied research, intervention evaluation, training, and surveillance in injuries.

CPSC has a long history of coordinating its work with that of other federal agencies. Memoranda of understanding (MOU) have been signed by CPSC with USFA, NHTSA, and CDC, the agencies with whom the Commission has crosscutting strategic goals. These MOUs provide a framework for inter-agency cooperation and coordination. For example:

CPSC and USFA. CPSC staff periodically briefs USFA staff on the agency's fire-related projects; provides guest speakers at the National Fire Academy; and provides technical advice on the NFIRS data collection system. USFA provides annual national fire-incident data to CPSC; results of their program activities related to fire protection and prevention; and suggestions on CPSC project priority-setting activities.

CPSC and NHTSA. CPSC and NHTSA share technical information and expertise on bicycle and bicycle helmet safety; jointly develop consumer bicycle safety information; and are jointly researching nighttime bicycle riding safety issues. NHTSA collects data on road-related bicycle deaths that CPSC uses to analyze the effectiveness of various safety devices, such as helmets, reflectors and lights. CPSC and NHTSA have joint responsibility for infant carriers that are also certified for use as car seats. CPSC is responsible for the safety of these products when used as infant carriers outside of motor vehicles.

CPSC and CDC. CPSC staff participates on CDC's Advisory Committee for Injury Prevention and Control; participates as a major partner in HHS' Healthy People Initiative, including monitoring progress on specific targets; provides suggestions for research projects in their grants program; and collects injury data for special studies of interest to them. CPSC and CDC work together in formulating projects; on education and information materials; and on studies of mutual interest. Currently, CPSC, CDC, DOT and other organizations form the "National Bicycle Safety Network," to jointly address issues associated with bicycle safety.

The following sections provide: CPSC's 1999 annual goals and activities for each strategic goal in the Strategic Plan (see pages 12-30); resources needed to meet the performance goals (see pages 31-34); and verification and validation procedures for performance measures (see pages 34-36).

² NHTSA: FY1999 Performance Plan (September 1997). Washington, D.C.: U.S. Department of Transportation, p.95.

KEEPING CHILDREN SAFE FROM HEAD INJURIES



STRATEGIC GOAL: The rate of head injury to children under 15 years old will be reduced by 10 percent from 1996 to 2006.

THE HAZARD

Head injury is a leading cause of death and disability to children in the United States. In 1995 alone, there were an estimated 800,000 product-related head injuries to children under 15 years old that were treated in hospital emergency rooms, or about 60 percent of all head injuries. Of these, about 475,000 were to children under 5 years old. Studies have shown that children have a higher risk of head injury than adults and that children's head injuries are often more severe.

Head injuries are potentially more serious than other injuries and can have life-altering consequences. In 1995, about 80 percent of the head injuries to children under 15 years old were diagnosed as concussions, fractures and internal head injuries, potentially the more serious head injuries. The types of consumer products under the Commission's jurisdiction that are most often associated with head injuries to children include bicycles, playground equipment, and other juvenile products. Participation in sports is also associated with high numbers of children's head injuries.

ANNUAL GOALS FOR 1999

In 1999, the Commission will concentrate its efforts on developing new, or strengthening existing, voluntary standards and developing head injury information that will allow progress towards reaching a targeted 10 percent reduction of the rate of head injuries to children by 2006.

- (1) Prepare and send to Voluntary Standards Organizations recommendations to strengthen or develop six voluntary standards.
- 1. Playground Surfacing

Revise the voluntary standards addressing falls from playground equipment in accordance with recommendations in the CPSC Playground Guidelines.

2. Baby Swings Develop a new voluntary standard that addresses falls and

head injuries from baby swings as well as other hazards.

3. *High Chairs* Revise the voluntary standard addressing the submarining

hazard, falls, and head injuries by falling from high chairs.

4. Infant Carriers Develop a new voluntary standard that addresses falls and

head injuries from infant carriers, as well as other hazards.

5. *Trampolines* Revise the voluntary standard to address falls and head

injuries resulting from impact with the frame and ground.

6. Sports-Related Head Gear Evaluate the voluntary standards for such sports-related head

gear as mountain bike helmets and roller hockey headgear to

ensure adequacy in protecting against head injury.

(2) Complete two testing and data collection activities:

1. Anthropometry Study Complete the second phase of the study to update the

Commission's 1977 child anthropometry data on the sizes of children's bodies. These CPSC data are essential for effectively addressing consumer product hazards to children, including head injury hazards, and are widely used in the development of

safety standards by the Commission and manufacturers.

2. Head Injury Costs Complete a study to determine the long-term consequences of

head injuries to provide realistic cost estimates.

(3) Identify and act on products that present a risk of head injury through:

1. Recalls and Corrective Pursue for recall or other corrective actions an estimated 15 products that present a substantial risk of head injury.

2. Violations and Recalls Identify and correct an estimated 10 products that fail to

meet mandatory safety standards and are likely to be

involved in head injury.

3. Monitoring Voluntary

Standards

Monitor two existing voluntary standards likely to reduce head injuries to determine the number of firms in compliance.

(4) Issue four public alerts or warnings on:

1. Bicycles Promote the use of bicycle helmets and safe bicycle-riding

practices that prevent head injuries to children.

2. All-Terrain Vehicles Warn teenagers, parents and other caregivers of ATV

hazards and promote the use of helmets and safe riding

practices that prevent head injuries to children.

3. Shopping Carts Work with safety groups and industry to continue a

program to equip shopping carts with safety straps, provide discount straps to stores that participate in the program, and encourage customers to buckle up their

children.

4. Winter Sports Warn about the need for child head protection in winter

sports, such as skiing and snowboarding.

(5) Alert the public to the hazards of head injury through:

1. *Press Releases* For recalled products presenting a substantial risk of head

injury, initiate an estimated 15 press releases to warn the

public.

2. Video News Release For at least one recalled product, work with the

(VNR)

(ATVs)

manufacturer of the recalled product to produce a VNR.

3. *Publications* Respond to consumer requests for an estimated 100,000

checklists, booklets, and safety alerts warning about head

injury hazards.

KEEPING CHILDREN SAFE FROM POISONING HAZARDS



STRATEGIC GOAL: The rate of death from unintentional poisonings to children under 5 years old from drugs and other hazardous household substances will not increase beyond 2.5 deaths per million children from 1994 to 2004.

THE HAZARD

Drugs and other hazardous household substances that are not in child-resistant packaging (CRP) can be easily opened by children. Before 1974, an average of 200 children under the age of 5 years died each year from poisonings by unintentionally ingesting these substances. Unintentional ingestions are those not supervised or administered by an adult. In 1970, Congress enacted the Poison Prevention Packaging Act (PPPA) requiring child-resistant packaging. Since the PPPA became law, deaths to children under 5 years have declined substantially to an average of less than 50 deaths annually by 1994 (the most recent year when data was available). While child poisoning deaths have been relatively low for a number of years, the Commission has seen evidence that without continued surveillance, the death rate could increase. For example, when ibuprofen was granted over-the-counter status, increased use of non child-resistant packaging resulted in a substantial increase in ingestions treated in hospital emergency rooms.

ANNUAL GOALS FOR 1999

In 1999, the Commission will continue its efforts to prevent any increase in the death rate from unintentional poisonings to children under 5 years old through regulation, testing, compliance, and consumer information.

- (1) Prepare for Commission consideration an Advanced Notice of Proposed Rulemaking, a Notice of Proposed Rulemaking, or a final rulemaking, on at least one hazardous substance for child-resistant packaging.
- (2) Conduct human performance tests on four packaging designs for compliance with child-resistance and adult-friendly requirements.
- (3) Pursue for recall or other corrective actions an estimated 30 products that violate safety regulations.
- (4) Coordinate a health and safety campaign by partnering with the Poison Prevention Council and related organizations to promote child-resistant packaging and other poison prevention measures during National Poison Prevention Week.
- (5) Produce a VNR on the hazards of unintentional poisonings to children.

KEEPING FAMILIES SAFE FROM FIRE HAZARDS



STRATEGIC GOAL: The rate of death from firerelated causes will be reduced by 10 percent from 1995 to 2005.

THE HAZARD

In 1995, about 3,700 people died because of fires that started in their homes. These fires resulted in property losses of about \$4.4 billion. Children are particularly vulnerable. Each year over 1,000 children under the age of 15 die from fire-related causes and over 600 of these deaths are to children under the age of 5 years. In fact, children under age 5 have a fire death rate more than twice the national average. Children at increased risk are often those from low income and minority families who live in poorer urban and rural areas.

ANNUAL GOALS FOR 1999

In 1999, the Commission will engage in a variety of activities to make progress towards reaching a targeted 10 percent reduction in the rate of fire-related deaths by 2005. Staff will: (1) prepare for Commission consideration two candidates for new final rules or other alternatives; (2) conduct hazard analyses and data collection activities to identify potential causes of fire-related deaths; (3) develop and assess the technical feasibility of potential product changes or performance requirements that could lead to safer products; (4) ensure compliance with fire safety standards by monitoring existing standards and identifying products that present a substantial fire hazard for corrective action plans; and (5) provide fire safety information to the public.

(1) Prepare for Commission consideration two candidates for final rulemaking or other alternatives.

1. Upholstered Furniture To address the risk of small open flame-ignited fires

involving upholstered furniture, the Commission may: (a) continue the rulemaking process by issuing a final rule; (b) work with standards-setting groups to complete a voluntary

safety standard; or (c) consider other alternatives.

2. *Multi-Purpose Lighters*To address the risk of injury or death from young children who start fires by playing with the lighters, it is anticipated that staff

will draft a proposed safety standard in 1998. In 1999, the Commission will: (a) issue a final rule for a mandatory performance or labeling standard; (b) work with standards-setting groups to complete a voluntary safety standard; or (c) consider other alternatives.

(2) Prepare and send to Voluntary Standards Organizations recommendations to strengthen or develop six voluntary standards:

1. Central Furnaces Develop standards requirements to address such hazards as

flame roll-out.

2. Arc Fault Fire Protection Develop recommendations for the National Electrical Code

that will include arc fault protection in branch circuits of all

new residential construction.

3. Sprinklers Develop recommended changes to the Underwriters

Laboratories' standards that should reduce the incidence of

sprinkler failures.

4. *Plastic Applications* Develop recommendations to address the fire hazards

resulting from the use of plastic components in unattended

small electrical appliances.

5. Electrical Reinspection Propose new requirements to update the current electrical

reinspection code.

6. Ranges and Ovens Develop recommendations to reduce range-top cooking

fires and minimize fire spread.

(3) Complete five hazard analysis and data collection activities:

1. Cigarette Lighters Assess the effectiveness of the 1994 standard requiring

lighters to be child-resistant.

2. *Clothes Dryers* Assess the causes of fires from clothes dryers and the

adequacy of existing standards requirements.

3. *Dishwashers* Assess the causes of fires from dishwashers and the adequacy

of existing standards requirements.

4. *Electrical Fire* Improve methods for investigation by developing an *Electrical*

Fire Investigation Guide to more effectively identify the causes of

electrical fires.

5. Wall Coverings Conduct a study of the factors contributing to wall covering

fires.

(4) Complete two technical feasibility studies on:

1. Cigarette Lighters Develop and construct a mechanical system for testing

> child-resistant lighters using robotic technology that will be more efficient and effective in screening lighters for child

resistance.

2. Gas-Fired Water Heaters Participate in the development of performance test requirements

to address the risk of flammable vapor ignition from spilled

gasoline or solvents.

(5) Identify and act on products that present a risk of fire-related death through:

1. Recalls and Corrective Pursue for recall or other corrective actions an estimated 50 Actions

products that present a substantial risk of fire-related death.

2. Violations and Recalls Identify and correct an estimated 350 products that fail to

meet mandatory fire safety standards.

3. *Monitoring Voluntary*

Standard

Monitor one existing voluntary standard likely to reduce

fire-related deaths to determine the number of firms in

compliance.

Conduct port-of-entry surveillance for at least one product 4. *Import Surveillance*

for which fire safety standards are in effect.

(6) Issue six public alerts and warnings on:

1. Fireworks Conduct an annual campaign for the Fourth of July holiday

> season to alert consumers to the common hazards associated with legal and illegal fireworks. The campaign will include a news conference to demonstrate the hazards; announcements

of fireworks recalls; and publication of injury prevention tips.

2. Home Heating Issue safety information designed to give consumers

> information related to home electrical system inspections; fuelfired heating equipment; coal and woodstoves; and smoke

detectors.

February 1998 13 3. Heat Tapes In the fall or winter season, alert consumers to the hazards of

> heat tapes used by consumers to keep pipes from freezing. Consumers will be urged to inspect heat tapes for damage and to replace old tapes with those meeting the new safety

standard.

4. Halloween Hazards Warn about the dangers of costumes catching on fire from

children carrying candles, and using matches and cigarette

lighters.

Warn about the risk of fire from defective decorative light 5. Holiday Hazards

strings and natural trees, as well as the safe use of candles

and fireplaces.

6. Cigarette Lighters Warn about the risk of fire from children under 5 years

playing with cigarette lighters.

(7) Alert the Public to Fire-Related Hazards through:

1. Press Releases For recalled products presenting a substantial risk of fire-

related deaths, initiate an estimated 35 press releases.

2. Video News Releases

(VNR)

Complete two VNRs: (1) for at least one recalled product, work with the manufacturer of the product to produce a VNR; and (2) produce a VNR for the fireworks safety campaign.

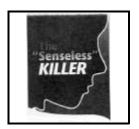
3. Publications Respond to consumer requests for an estimated 100,000

checklists, booklets, and safety alerts warning about fire-related

hazards.

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KEEPING FAMILIES SAFE FROM CARBON MONOXIDE POISONINGS



STRATEGIC GOAL: The rate of death from carbon monoxide poisoning will be reduced by 20 percent from 1994 to 2004.

THE HAZARD

Carbon monoxide (CO) is a poisonous gas that has no smell, color or taste -- truly a "senseless" killer. This gas is produced by burning any fuel, such as gas, oil, wood, and coal, so that any fuel-burning appliance is a potential CO source. Available data show that an average of over 200 people die and almost 10,000 are injured each year from unintentional CO poisoning-related incidents, excluding incidents involving auto exhaust and fires, at a societal cost of over 1 billion dollars annually. Children under 15 years account for 10 percent of the deaths and 38 percent of the injuries. Because some of the symptoms of CO poisoning may mimic common illnesses such as influenza or colds, there is a high incidence of missed initial diagnosis. Not only are victims frequently unaware of exposure to CO, but health care providers often do not suspect, or check for, CO poisoning.

ANNUAL GOALS FOR 1999

In 1999, the Commission will concentrate its efforts on: (1) submitting proposals for changes in national model building codes and developing model legislation for state and local jurisdictions; (2) strengthening voluntary standards to reduce CO poisonings by addressing the hazards of incomplete combustion from gas appliances and unacceptable levels of CO emissions; (3) completing data collection and analysis activities to identify additional product emission problems; (4) ensuring compliance with CO safety standards by monitoring existing safety standards and identifying products that present a substantial CO hazard for corrective action plans; and (5) providing CO safety information to the public.

(1) Develop and submit two proposals for changes in national model building codes and developing model legislation.

1. National Model Building Code Organizations

Develop proposals to require installation of CO detectors in new residential construction.

2. State and Local Jurisdictions Develop model legislation for state and local

governments to use in the development of their own

legislation to require CO detectors in new

residential construction.

(2) Prepare and send to Voluntary Standards Organizations recommendations to strengthen or develop three voluntary standards:

1. *Unvented Appliances and Heaters* Develop recommendations to address unacceptable

levels of CO emissions.

2. Camping Heaters Revise the voluntary standard to address the risk

of CO poisoning.

3. Furnaces Develop recommendations to address CO emissions

from gas furnaces by improving existing vent safety

shut-off performance requirements.

(3) Complete four hazard analysis and data collection activities on:

1. Data Sources Examine and develop two sources of data on CO

poisonings to clarify inconsistencies in statements

about CO poisonings.

2. Investigation Guidelines Revise and consolidate investigation guidelines for

combustion appliances to provide more details on

accident causes and contributing factors.

3. Risk-Reduction Strategies Assemble previous years' work on CO poisonings

into risk-reduction strategies.

4. *Unvented Gas Appliances* Assess the causes of CO emissions from decorative

appliances, such as gas logs, and gas ranges and the

adequacy of the existing standards requirements.

(4) Identify and act on products that present a risk of death from CO poisoning through:

Recalls and Corrective Actions Pursue for recall or other corrective actions an

estimated four products that present a substantial risk of death from CO poisoning.

(5) Issue two public alerts or warnings.

1. *Nationwide Outreach* Through the State Partners Program, develop and implement

a public health campaign with all 50 states to inform the consumers, health and medical professionals about the hazards of CO poisoning and promote CO detectors manufactured to the new Underwriters Laboratories standard. Hold press conferences and media events in 25

locations nationwide.

2. CO Safety Awareness

Week

Issue a press release and safety alert to inform consumers about the sources of CO poisoning and the means to prevent

and detect CO buildup in homes.

(6) Alert the public to the hazards of CO poisoning deaths through:

1. Press Releases For recalled products presenting a substantial risk of death

from CO poisoning, initiate an estimated three press

releases to warn the public.

2. *Publications* Respond to consumer requests for an estimated 30,000

checklists, booklets, and safety alerts warning about CO

poisoning hazards.

KEEPING FAMILIES SAFE FROM ELECTROCUTIONS



STRATEGIC GOAL: The rate of death from electrocutions will be reduced by 20 percent from 1994 to the year 2004.

THE HAZARD

There are over 200 deaths from electrocutions each year in the United States. Ten percent of the deaths are to children under 15 years old. The deaths occurred most often because an electrical current came in contact with a victim's body and traveled through the victim to the ground. Most of the deaths could have been prevented by installing ground fault circuit interrupters (GFCIs). These are inexpensive electrical devices that are installed in household electrical circuits and in small appliances. However, not all homes and products are protected by GFCIs. The Commission continues to receive reports of electrocution deaths from products such as house wiring, lamps and light fixtures, antennas, power tools, and small and large appliances.

ANNUAL GOALS FOR 1999

In 1999, the Commission will concentrate its efforts on (1) strengthening voluntary standards to reduce electrocutions by increasing the effectiveness and use of devices that make home wiring systems safer; (2) ensuring compliance with electrical safety standards by monitoring existing safety standards and identifying products that present a substantial electrical hazard for corrective action plans; and (3) providing electrical safety information to the public.

(1) Prepare and send to the Voluntary Standards Organization two recommendations to strengthen the requirements for Ground Fault Circuit Interrupters (GFCIs).

1. *Installation* Make recommendation to improve the design of GFCIs for easier installation.

GPCIS for easier installation.

2. Enhanced Design Make recommendation to incorporate electronic

self-test requirements for GFCIs.

(2) Provide recommendations to National Code Groups.

National Electrical Code Develop code recommendations for improved

appliance grounding.

(3) Identify and act on products that present a risk of electrocution through:

1. Recalls and Corrective Actions Pursue for recalls or other corrective actions an

estimated 20 products that present a substantial risk

of electrocution.

2. *Monitoring Voluntary Standards*Monitor one existing voluntary standard to

determine the number of firms in compliance.

(4) Alert the public to electrical hazards through:

(VNR)

1. Roundup-for-Safety Campaign Develop and implement a campaign to encourage

consumers to dispose of older power tools which

have poor insulation and a high risk of

electrocution.

2. Video News Release For at least one recalled product, work with the

manufacturer of the recalled product to produce a

VNR.

3. *Press Releases* Initiate an estimated eight press releases to advise

the public of recalled products with a substantial

risk of electrocution.

4. *Publications* Respond to consumer requests for an estimated

30,000 safety alerts, checklists and booklets.

INFORMING THE PUBLIC

STRATEGIC GOAL: An increase in consumer awareness of CPSC safety information from 1997 to the year 2001 through:



- # Increasing contacts to CPSC's web site by 500 percent,
- # Increasing the reach of the Commission's publication, the Consumer Product Safety Review, by 200 percent,
- # Maintaining the capability to respond to Hotline calls for safety information at or above 250,000 per year.

THE PROGRAM

Part of the Commission's mission is to assist consumers in evaluating the comparative safety of consumer products. To accomplish this requires a communication network that educates and informs the public about the safe use of consumer products and product recalls. The Commission also receives reports from the public about unsafe products, as well as inquiries about product recalls. CPSC uses a variety of techniques to effectively and economically communicate safety information to the public and encourage feedback, including Hotline services, Internet services, the National Injury Information Clearinghouse, media programs, publications, consumer information and education programs, and partnership programs.

ANNUAL GOALS FOR 1999

In 1999, contacts by the public to CPSC's web site and the *Consumer Product Safety Review* will be increased and Hotline calls maintained, through improved service delivery and publicizing of the Commission's services.

(1) Increase web site contacts by 250% through:

1. Access to Commission Databases

Develop procedures to allow the public direct access to four Commission databases such as the National Electronic Injury Surveillance System (NEISS). Access to the NEISS, for example, will allow the public immediate access to the most up-to-date product-related injury information.

2. Enhance Educational Capacity Improve the "4 Kids" section of the site and link to

the Department of Education's Network of up to 50 other educational sites to increase contacts made by

teachers, students and researchers.

3. *Update Current Hardware* Replace current equipment so that web site users

can make more detailed and specific searches.

(2) Increase the reach of the *Consumer Product Safety Review (Review)*, the Commission's quarterly publication on safety issues, through:

1. Contact with National Non-Profit Organizations

Contact 50 national non-profit organizations interested in consumer safety to persuade them to promote the *Review* in their newsletters, electronic bulletin boards, and on their web sites.

2. Contact with Industry, Professional Groups, and Professionals

Contact 500 industries, professional organizations, and professionals to persuade them to subscribe to or access the *Review* on the Commission's web site. Based on results of ongoing, preliminary outreach, groups with most potential will be contacted more heavily and may include manufacturers; trade associations; attorneys; university schools of public

health, medicine, nursing, pharmacy, law, and business; and medical societies.

(3) Maintain the capacity of the Hotline to respond to calls from the public for safety information at or above 250,000 per year by:

1. Increased Public Exposure to the Hotline Number

Publish the Hotline number in 200 CPSC publications, including press releases, safety alerts, 50 documents on CPSC's web site, 12 video news releases and other publications.

2. Outreach to National Organizations

Establish new contacts and maintain existing contacts with 100 national organizations interested in consumer safety to publicize the Hotline number and other safety information.

INDUSTRY SERVICES



STRATEGIC GOAL: By the year 2001, attain 80 percent success with the timeliness and usefulness of the Fast Track Product Recall and Small Business Ombudsman programs for industry.

THE PROGRAM

The Commission's Compliance program ensures that firms comply with the laws, regulations and safety standards that protect consumers from hazardous and defective products. When a violation of a safety standard is found or a defective product is identified, CPSC works cooperatively and quickly with industry to obtain a correction of the violation or recall of the hazardous product, as appropriate.

Recently, the agency initiated two programs to assist industry in complying more quickly with CPSC's regulations: the Fast Track Product Recall (Fast Track) and Small Business Ombudsman programs. With the Fast Track program, a firm that reports and corrects a problem quickly will not be subject to a preliminary determination that the product presents a substantial risk of injury. Advantages of this program to industry include reductions in paperwork, red tape, and potential legal expenses related to the recall of potentially defective products. The advantages of this program to CPSC include removing hazardous products from consumers' hands more quickly. With the Small Business Ombudsman program, Commission staff helps small businesses comply more easily with product safety guidelines and manufacture safer products. This program provides firms with a single point of contact that expedites a clearly understandable response from the CPSC technical staff.

ANNUAL GOALS FOR 1999

During 1999, CPSC activities will include assessments and targets for industry service standards.

Complete a review of the timeliness and usefulness of CPSC's advice and guidance through:

1. Assessing Services

Assess the satisfaction of firms who request advice and guidance through CPSC's Small Business Ombudsman program.

2. Industry Service

Acknowledge requests from Industry to participate in a Fast Track program within 5 days. Complete a technical review and initiate a recall, or notify the firm of a delay, within 20 days 80 percent of the time. Implement Fast Track corrective action plans that will be judged by firms as within their capabilities.

Respond to requests from small businesses through the CPSC Small Business Ombudsman within 3 business days or notify the firm of a delay within 3 business days 80 percent of the time.

3. Tracking Performance

Develop databases to provide more accessible performance information to staff.

CONSUMER SATISFACTION WITH CPSC SERVICES



STRATEGIC GOAL: Maintain the high level of satisfaction of consumers with the Hotline and Clearinghouse and the states with CPSC's State Partnership Program at 90 percent or better through the year 2001.

THE PROGRAM

The Commission alerts the public to important safety information through the agency's Hotline, National Injury Information Clearinghouse, and State Partners Program. The Hotline is a toll-free service that allows consumers to report product complaints or product-related injuries, learn about recalls and safety hazards, and obtain safety publications. The National Injury Information Clearinghouse provides data to the public in response to over 5,000 requests each year. It also alerts manufacturers to potential hazards associated with their products, providing them with consumer complaints, reported incidents and accident investigations involving their products. The Commission's State Partners Program, using limited CPSC funds and CPSC-developed safety information, brings product safety services to consumers through cooperative programs with state and local governments. The program extends CPSC's reach throughout the Nation.

ANNUAL GOALS FOR 1999

In 1999, activities to maintain high levels of customer satisfaction with CPSC services include improving those services and meeting published customer service standards.

(1) Maintain consumer satisfaction with Hotline services through:

1. *Maintaining Timeliness*Maintain the time of 30 seconds or less to reach a Hotline representative.

2. *Meeting Customer Service* Continue a performance-based contract with monetary incentives for meeting customer

services standards by contract staff.

(2) Maintain consumer satisfaction with Clearinghouse services through:

1. Surveying Customers Contact Clearinghouse requesters in 1999 to

determine satisfaction and compare to 1996 baseline

levels.

2. Customer Service Respond to over 5,000 requests for information in a

manner fully consistent with published customer

service standards.

(3) Maintain consumer satisfaction with the State Partners Program's services through:

1. Recall Round-Up Develop and implement a Recall Round-Up

program with our State Partners in all 50 states to encourage the repair, return, or destruction of

selected consumer products not meeting safety standards. Hold press conferences and/or media

events in 25 states.

2. *Rapid Communications* Develop and implement procedures to automatically

Network link CPSC to 135 state and local partners through

the Internet. This capability will allow for the immediate sharing of safety and product hazard

information.

3. Customer Service Continue to meet customer service standards at

or above 1996 levels.

Resources Needed to Meet the Performance Goals

This section describes the operational processes the agency will use to achieve its annual goals and the resource assumptions on which the annual goals are based. It also provides the methodology for allocating CPSC's budget request to strategic goal activities in the Annual Performance Plan; the resources distributed by strategic goals; and a crosswalk between the budget programs and strategic goals.

Operational Processes. The agency plans to achieve its annual goals by using its current operational processes. These include the:

- # Identification and analysis of hazards;
- # Development of voluntary or mandatory product safety standards and guidelines;
- # Application of voluntary or mandatory corrective actions, including product recalls;
- # Fostering of partnerships with other government agencies and private organizations; and
- # Distribution of information to the public on how to avoid product hazards.

Resources Needed to Accomplish Annual Goals. For 1999, the budget request for the agency is \$46.5 million with a staff level of 480 Full Time Equivalents (FTEs) nationwide. All of the annual goals outlined in this document assume that the \$46.5 million or equivalent purchasing power will be available for 1999. The annual goals may need to be adjusted to reflect the actual level of funding and staff made available to the agency.

Most of the Commission's resources are allocated to professional and technical staff who identify product-related hazards; investigate and act on product safety hazards and violations of safety regulations; provide recommendations to the Commission for decision-making; and inform the public about product safety. After staff and related space rental costs, less than 20 percent of the agency's annual budget is available for other critical support costs, such as data collection, in-depth investigations, independent expert technical evaluations, and travel in support of investigations and voluntary standards development. The challenge to the Commission is to work within these constraints while maintaining enough flexibility to fulfill its mission of protecting the public.

Methodology. Resources for the Annual Performance Plan are based on those activities related to the strategic goals for both direct and indirect costs. Three of the five programs in the budget, Hazard Assessment and Reduction (HAR), Compliance, and Consumer Information (CI), have 1999 activities directly related to the strategic goals. The remaining two programs, Hazard Identification and Analysis (HIA) and Agency Management (AM) support the other budget programs and are reflected in the Annual Plan as indirect costs.

Three steps were used to estimate the resource allocation for each strategic goal:

- ! Direct costs for each strategic goal were determined for those activities that were classified by hazard in the budget (e.g., resources for the multi-purpose lighter project were directly applied to the goal for reducing fire-related deaths).
- ! Direct costs were estimated for those strategic goal activities that were *not* classified by hazard in the budget, such as recalls, corrective actions, and violations. Using historical data and expert judgment, staff estimated the distribution attributable to the strategic goals.
- ! Indirect costs (HIA and AM) were proportionately distributed to the strategic goals because these programs provide support to all agency efforts.

Direct and indirect costs were combined for each goal area. The total resources allocated to Results Act activities in the Annual Plan are likely conservative because historical data is not available to classify some activities by strategic goal. Improved resource estimates will be available in the future as Commission data bases are modified to respond to the Results Act requirements.

Resource Distribution. In 1999, about 67 percent of the agency's total budget, or \$31 million, and about 66 percent of agency staff, or 315 FTEs, are devoted to activities directly related to meeting the strategic goals. The remainder of the resources, about 33 percent, are devoted to mission-related work on other hazards, such as non-head injury related hazards to children. These other hazards may be selected for injury or death reduction goals in future strategic plans.

The distribution of resources by strategic goal is shown in Figure 1. Substantial resources (35.5%) are devoted to reducing fire-related deaths, reflecting the high number of deaths for this particular hazard (over 3,700 people a year). This hazard also disproportionately claims the lives of over 1,000 children each year. Additional resources (24.3%) are also devoted to children through activities designed to reduce child head injuries and prevent any increase in child poisoning deaths. Resources devoted to reducing CO poisoning and electrocutions are at similar levels (6.4% and 8.4% respectively), reflecting hazards of similar magnitudes.

About 25.5 percent of the 1999 resources are devoted to meeting strategic goals for service quality; industry advice and guidance; and consumer satisfaction. About 17 percent of these resources support activities for achieving success with the timeliness and usefulness of the Fast Track Product Recall and Small Business Ombudsman programs. These programs were initiated to assist industry in complying with CPSC's regulations and to correct problems quickly. About 5.6 percent of the resources are devoted to consumer satisfaction with CPSC's services. Satisfaction with CPSC's services may encourage consumers to use the safety information they receive from CPSC, resulting in safer consumer behaviors. Finally, resources devoted to service quality, at 2.5 percent, allows for maintaining the Hotline's capacity to

respond to 250,000 calls per year and encouraging public contacts with CPSC's web site and publication, the *Consumer Product Safety Review*.

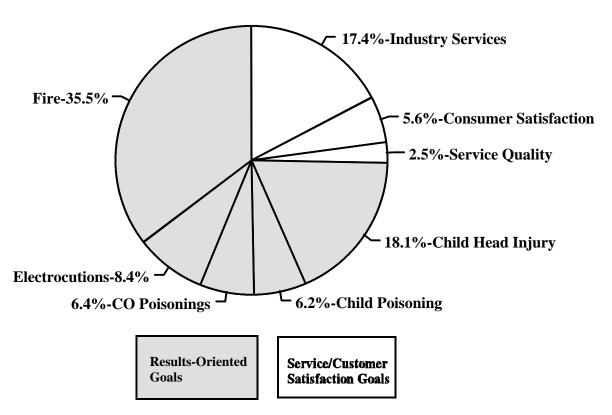


Figure 1
Distribution of 1999 Results Act Resources

[Percents do not add to 100% due to rounding]

The crosswalk between the agency's budget programs and the Results Act goals is shown in Table B. For each program in the budget, the majority of the resources are allocated to Results Act work, ranging from 55 percent for the Consumer Information program to 71 percent for the Hazard Assessment and Reduction program. About 67 percent of total agency resources devoted to Results Act work are allocated to the three core programs with activities directly related to the strategic goals: HAR, Compliance, and CI. The remaining two budget programs, HIA and AM, are necessary to support the Results Act activities of the three core programs. The HIA program provides much of the data used by staff to address hazards. The AM program provides policy and program guidance; necessary information technology; and other required administrative support.

Table B 1999 Crosswalk Between Budget Programs and Results Act Goals (Dollars in Thousands)

Budget Programs	Results Act	Other Hazard Work	Total Agency
Hazard Identification and Analysis (HIA) ¹	\$4,421	\$2,303	\$6,724
	(66%)	(34%)	(100%)
Hazard Assessment and Reduction (HAR)	6,006	2,440	8,446
	(71%)	(29%)	(100%)
Compliance	11,885	5,276	17,161
	(69%)	(31%)	(100%)
Consumer Information (CI)	3,032	2,452	5,484
	(55%)	(45%)	(100%)
Agency Management (AM) ¹	5,718	2,967	8,685
	(66%)	(34%)	(100%)
Total Agency	\$31,062	\$15,438	\$46,500
	(67%)	(33%)	(100%)

¹ Program resources allocated proportionately to Results Act and Other Agency work.

Verification and Validation

This section describes the means by which CPSC intends to verify and validate the results of its performance measurement. A complete list of performance measures with corresponding databases and verification procedures is provided in Table C. Each annual goal was set by targeting a number of activities or actions to be completed in 1999. Following is a description of existing data sources and verification procedures used to track performance.

- ! *Milestone Tracking Systems* are used to record the completion dates for significant activities, such as Commission briefings, recommendations sent to voluntary standards committees, and completed reports. These are verified through review by senior managers and a formal clearance process, resulting in publicly available official documents.
- ! The Compliance Corrective Actions (CCA) database is used to track recalls

and corrective actions for defective products. This information is verified through reviews of each action by senior managers and Commissioners in monthly meetings.

- ! The Integrated Field System (IFS) is used to track violations and recalls for regulated products and the monitoring of conformance to voluntary standards. Information on violations and recalls is verified through reviews of each action by senior managers and Commissioners in monthly meetings. Voluntary standards monitoring is reviewed on completion by senior managers and Commissioners.
- ! *The Press Release (PRE)* database is used to record all press releases issued by the Commission. They are placed on CPSC's web site the day they are issued and also may be verified through official documents.
- ! *The Video News Release (VNR)* file log is used to track VNRs developed with Commission resources and those produced by manufacturers in cooperation with CPSC. The number of VNRs and related information are reported to CPSC through communications contractors who distribute the VNRs to television stations by satellite.
- ! The *Inventory of Publications* records the number of each CPSC publication distributed to requestors. This information is reported to CPSC by the Department of Agriculture, which stores and distributes them.
- ! Logs of contacts and actions are used to track web site and outreach contacts; Hotline callers; and the timeliness of CPSC actions. The number of contacts to CPSC's web site and the number of Hotline callers are automatically recorded through existing software developed and serviced by contractors. Outreach contacts are verified by manager review. The timeliness of CPSC actions is recorded through CPSC-developed software programs that automatically summarize and report actions taken by staff and when they are taken.
- ! Assessing services and surveying customer satisfaction is determined through random samples with verification through procedural checks, such as data quality checks and standardized protocols.

Table C Verification and Validation of Performance Measures for Annual Goals

Type of Performance Measure	Performance Measure	Database	Verification/Validation
Results-Oriented Goals			
Commission briefings	Number of briefings	Milestone tracking	Official documents
Voluntary standards development or changes	Number of recommendations	Milestone tracking	Official documents
National codes changes	Number of recommendations	Milestone tracking	Official documents
Model legislation	Number of recommendations	Milestone tracking	Official documents
Hazard/cost analyses, data collection	Number of reports completed	Milestone tracking	Official documents
Technical feasibility studies	Number of reports completed	Milestone tracking	Official documents
Recalls or corrective actions	Number of actions	IFS*	Manager/Commissioner review
Violations and recalls	Number of actions	CCA*	Manager/Commissioner review
Voluntary standards monitored	Number of VS monitored	IFS	Manager/Commissioner review
Public education efforts	Number of efforts	Milestone tracking	Official documents
Press releases	Number of releases	PRE*	Official documents
Video news releases (VNR)	Number of VNRs	VNR file log	Contractor report
Publications	Number of requests	Inventory	Contractor report
Service Quality			
Web site	Number of contacts	Web server file log	Automated reports (Contractor)
Outreach to professional organizations	Number of contacts	Log of contacts	Manager review
Maintain Hotline's capacity at 250,000 calls	Number of callers	Hotline Operating System	Automated reports (Contractor)
Improve services	Number of services improved	Milestone tracking	Manager review
Industry Services			
Assess services	Responses of industry callers	Random sample	Procedural checks
Meet timeliness standards	Number of standards met	Log of actions	Automated reports
Track performance	Procedures completed	Milestone tracking	Manager review
Consumer Satisfaction			
Meet timeliness customer service standards	Number of standards met	Log of actions	Automated reports
Improve services	Number of services improved	Milestone tracking	Manager review
Survey consumer satisfaction	Ratings by consumers	Random sample	Procedural checks

^{*}IFS = Integrated Field System; CCA = Compliance Corrective Actions; PRE = Press Release database